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10 Attorneys for Defendant  
EDUARDO ALFONSO VIERA-CHIRINOS

**FILED**

Mar 16 2021

SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO

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13 UNITED STATES DISTRICT COURT  
14 NORTHERN DISTRICT OF CALIFORNIA  
15 SAN FRANCISCO DIVISION  
16

17 UNITED STATES OF AMERICA,  
18 Plaintiff,

19 v.

20 EDUARDO ALFONSO VIERA-  
CHIRINOS,

21  
22 Defendant.

Case No. CR 19-00367-CRB-1

**DEFENDANT EDUARDO ALFONSO VIERA-  
CHIRINOS' ADMINISTRATIVE MOTION TO  
FILE EXHIBITS 1 AND 3 UNDER SEAL**

23  
24 Defendant EDUARDO ALFONSO VIERA-CHIRINOS hereby moves to file under seal Exhibits  
25 1 and 3 referenced in his Motion for Reconsideration of Pretrial Detention Order filed in the above  
26 captioned case. Sealing is appropriate as the exhibits contain confidential information.  
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1 Specifically, Exhibit 1 consists of Mr. Viera-Chirinos' medical records. Mr. Viera-Chirinos  
2 believes disclosure of such confidential health information in this case would cause serious harm to his  
3 privacy interest as recognized under HIPAA and related regulations.

4 Exhibit 3 consist of a wiretap transcript that contains personal identifying information (PII).

5 Accordingly, Mr. Viera-Chirinos respectfully requests that the Court order Exhibits 1 and 3  
6 referenced in his Motion for Reconsideration of Pretrial Detention Order be filed under seal until further  
7 order of the Court.  
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9  
10 Respectfully Submitted,

11 DATED: March 5, 2021

12 /s/ Hilary Blamey  
13 HILARY BLAMEY  
14 NAOMI CHUNG  
15 Attorneys for Eduardo Viera-Chirinos  
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15 Attorneys for Defendant  
16 EDUARDO ALFONSO VIERA-CHIRINOS

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Mar 16 2021

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SAN FRANCISCO

17 UNITED STATES DISTRICT COURT  
18 NORTHERN DISTRICT OF CALIFORNIA  
19 SAN FRANCISCO DIVISION

20 UNITED STATES OF AMERICA,  
21  
22 Plaintiff,  
23  
24 v.  
25 EDUARDO ALFONSO VIERA-  
26 CHIRINOS,  
27  
28 Defendant.

Case No. CR 19-00367-CRB-1

**DEFENDANT ALAN EDUARDO ALFONSO  
VIERA-CHIRINOS' ADMINISTRATIVE  
MOTION TO FILE EXHIBITS 1 AND 3  
UNDER SEAL**

I, Hilary Blamey, declare as follows:

1. I am an attorney admitted to practice in the State of California and before the federal district court for the Northern District of California. I am attorney for defendant Eduardo Viera-Chirinos in *United States v. Eduardo Viera-Chirinos*, 19-CR-00367-CRB-01 (N.D. Cal). I respectfully

1 submit this declaration in support of Defendant's Administrative Motion to File Exhibits 1 and 3 under  
2 seal as related to Defendant's Motion for Reconsideration of Pretrial Detention Order.

3         2.         Mr. Viera-Chirinos is filing an administrative motion seeking to file Exhibits 1 and 3  
4 under seal. Placeholder documents for Exhibits 1 and 3 will be filed with Mr. Viera-Chirinos' Motion  
5 for Reconsideration of Pretrial Detention Order.  
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7         3.         Exhibit 1 contains Mr. Viera-Chirinos' confidential health information and should  
8 therefore be filed under seal in order to protect his privacy interest as recognized under HIPAA and  
9 related regulations.

10         4.         Exhibit 3 consists of a wiretap transcript that contains personal identifying information  
11 (PII).  
12

13         I declare under penalty of perjury that the foregoing factual assertions are true and correct to the  
14 best of my knowledge and belief.

15         Executed on March 5, 2021, in San Francisco, California.  
16

17                                 /s/ Hilary Blamey  
18                                 HILARY BLAMEY  
19                                 Declarant  
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~~PROPOSED~~ ORDER

For the reasons stated above, the Court orders that Exhibits 1 and 3, to the Defendant Eduardo Viera-Chirinos' Motion for Reconsideration of Pretrial Detention Order, as lodged with this Administrative Motion to Seal, shall be filed under seal until further order of the court.

IT IS SO ORDERED.

Dated: March 16, 2021

  
HON. THOMAS S. HIXSON  
United States Magistrate Judge